REMARKS

In accordance with the foregoing, claims 1, 6, 11, 16 and 23 are amended and new claims 24 and 25 are presented. No new matter is presented, and accordingly approval and entry of the foregoing claims are respectfully requested.

Claims 1-2, 4-7, 9-12, 14-17 and 19-25 are pending and under consideration. Reconsideration is requested.

Claim Amendments

Claim 1 is amended herein to recite a CAD generation management system including "displaying first lines connecting those icons of the displayed icon data that are related based on first generation information and displaying second lines connecting those icons of the displayed icon data that are related based on second generation information." Claims 6, 11, 16 and 23 are amended in a similar manner.

Support for the amendment is found, for example, in Fig. 9 and page 19, line 14 - page 20, line 23 of the specification.

No new matter is presented in any of the foregoing and, accordingly, approval and entry of the amended claims are respectfully requested.

Items 5-8: Rejection of claims 1-2, 4-7, 9-11, 13-17 and 19-23 under 35 U.S.C. §103(a) as being unpatentable over Fujieda (U.S.Pat. Pub 2001/0007997) in view of combinations of Chartier et al. (U.S.P. 6,636,211) and Miller et al., (U.S.P. 6,661,437)

In items 5-6 of the Office Action, the Examiner rejects claims 1-2, 5-7, 10-11, 13, 15-17 and 20-23 under 35 U.S.C. §103(a) as being unpatentable over Fujieda in view of Chartier. (Action at pages 2-39). In items 7-8 of the Office Action, the Examiner rejects dependent claims 4, 9, 14, and 19 under 35 U.S.C. §103(a) as being unpatentable over Fujieda in view of combinations of Chartier and Miller. (Action at pages 39-40). The rejections are respectfully traversed.

Independent claim 1 recites a CAD generation management system connectable to a display unit, including:

a) "a storage section . . . to store file information in units of generations, <u>each</u> file information having a<u>different generation before and after a modification</u> by an editing process (emphasis added);

b) "an inter-file correspondence table . . . to store corresponding relationships of the file information . . ., including generation information;"

c) "an icon storage . . to store icon data corresponding to the file information, said icon data including an image representative of a CAD image corresponding to the file information;" and

d) "a processing unit. . . to display, on the display unit, <u>icon data of the file information stored in the storage section in units of generations, and to display relationships of the file information corresponding to the icon data</u> (emphasis added),"

e)"wherein a modification of one of two related units of file information by the editing process affects the other of the two related units of file information, including the generation information, and

f) "the processing unit displays on the display unit the relationships of the file information, corresponding to the icon data and having different generations, by <u>displaying first lines</u> connecting those icons of the displayed icon data that are related <u>based on first generation information</u> <u>and displaying second lines</u> connecting those icons of the displayed icon data that are related <u>based on second generation information</u>. (emphasis added)." Independent claims 6, 11, 16 and 23 have a similiar recitation.

Applicants submit features recited by each of the independent claims are not taught by an *arguendo* combination of the art relied on by the Examiner.

Applicants submit that Fujieda, alone or in combination, does not teach a system including storing a "<u>different generation</u> before and after a modification by an editing process; ...to display, on the display unit, icon data of the file information . . in <u>units of generations</u>, and to <u>display relationships of the file information corresponding to the icon data</u>," . . .(and) displays on the display unit the relationships of the file information, corresponding to the icon data and having different generations, by <u>displaying first lines</u> connecting those icons of the displayed icon data that are related <u>based on first generation information</u> <u>and displaying second lines</u> connecting those icons of the displayed icon data that are related <u>based on second generation information</u>, as recited by claim 1, for example.

In item 9 of the Office Action, entitled Response to Arguments, the Examiner asserts:

> Applicants argue . . . plurality of parts which are connected by lines in the display of Fujieda all belong to the same phase. . . . Applicants ...submit that Fujieda fails to disclose . . the claimed...because the lines connecting the plurality of parts in FIG. 10 of Fujieda connect a plurality of parts in the same phase". However, . . . paragraphs 143-144, and 149-150 which state " . . .different phases are set for a model and the version number is assigned to each phase, thus making it possible to manage the model by the phase. . . . display a plurality of phases on screen at the same time by executing a predetermined command . . .Such a screen is shown in FIG. 11, by way of example. . . . (Paragraphs 149-150). . . . because

Figure 10 depicts the Rear Suspension as being modified (Rear Cushion 1 to rear Cushion 2), then as a result, that part is stored in multiple generations because the Phase 1 is different from the Phase 2 version. . . . because the rear cushion is in a different generation from the rest of the parts, Fujieda teaches the aforementioned limitation.

(Action at page 41, line 9 - page , 42, line 5).

Applicants submit that, by contrast, Fujida merely teaches:

In the illustrated example, "Rear Suspension Ph1" relating to phase #1 and "Rear Suspension Ph2" relating to phase #2 are shown on the same screen. This display screen permits the part or unit of a previous phase to be <u>looked up with ease</u>"

(Emphasis added See, Fig. 11, and paragraph [0050])

That is, Fujida merely teaches displaying a first icon for one *arguendo* generation "Rear Suspension Ph1" and another icon for another *arguendo* generation "Rear Suspension Ph2" and illustrating that both of the generations are "body-related parts."

That is, Fujida does not display the connecting lines "based on generation information." Rather, the generation information, i.e., "Ph1" and "Ph2" is <u>independent of the relationship</u> to the other icons, i.e., "body -related part."

This can be contrasted with Fig. 9, for example, illustrating a display unit according to an exemplary embodiment displaying first lines connecting those icons of the displayed icon data that are related <u>based on first generation information</u> and displaying second lines connecting those icons of the displayed icon data that are related <u>based on second generation information</u>.

As an example, Fig.. 9 simultaneously displays the relationships of the (plurality of) file information, by -connecting the file information, e.g., file information "TAMURA1DRW" and the icon data of the related parts, e.g., icon data of related parts "TAMURA1", "TAMURA2" and "TAMURA2-1" with first lines, e.g., bold solid line relating file information for a first generation. Fig. 9 illustrates second lines based on second generation information, i.e., dotted line to relate the file information for another generation, i.e, "TAMURA1DRW (generation 2)" to the related parts, i.e, "TAMURA1 (generation 1)" and "TAMURA2.. Thus, according to an exemplary embodiment different generations of the parts, indicated by the icon data, may be related by the lines simultaneously.

Further, Fujida discloses:

[A]ll data of the specified unit... used as the data of the new phase. Alternatively, only a revised portion of the data may be copied, followed by the necessary modification, and the other portions may be correlated with the corresponding portions of the previous data. This makes it possible to reduce the amount of

data.

(See, for example, paragraph [00159]

Applicants submit that with such a teaching of saving of data Fujida teaches away from a system, for example, displaying first lines connecting those icons of the displayed icon data that are related based on first generation information and displaying second lines connecting those icons of the displayed icon data that are related based on second generation information, as recited by claim 1.

Applicants submit that nothing in the teaching of Chartier nor Miller overcomes the deficiencies in the art of record discussed above.

Rather, as the Examiner indicates Chartier "teaches icons connected with lines on GUI display." The Examiner relies on Miller as teaching a width and a color of lines.

Dependent claims 2, 4-5, and 21, claims 7, 9-10, and 22, claims 12 and 14-15, and 17 and 19-20 depend respectively from independent claims 1, 6, 11, and 16 and include features of that claim from which they depend not taught nor suggested by the art of record, plus additional features.

Applicants submit this traversal meets the Consideration of Applicant's Rebuttal Evidence Examination Guidelines for Determining Obviousness Under 35 U.S.C. 103 in View of the Supreme Court Decision in *KSR* International Co. v. Teleflex Inc. of October 3, 2007 and the elements in combination do not merely perform the function that each element performs separately, and the results of the claimed combination were unexpected.

Summary

Since features recited by independent claims 1, 6, 11, 16, and 23 (and respective dependent claims) are not taught by even an *arguendo* combination of the art relied on by the Examiner, the rejection should be withdrawn and claims 1-2, 4-7, 9-11, 13-17 and 19-23 allowed.

New Claim

New claims 24-25 recite features of an exemplary embodiment of the present invention in a different fashion. Claims 24-25 recite a method of presenting information on a display for a plurality of files with at least one of the files having a plurality of versions, the method comprising: assigning an icon to each of the plurality of files; displaying the assigned icons for each of the plurality of files and each of the versions of the files; displaying a first line connecting related icons for a first version displaying a second line connecting related icons for a second version.

Support is found, for example, in Fig. 9 and page 19, line 14 - page 20, line 23. No new

matter is presented in any of the foregoing and, accordingly, approval and entry are respectfully requested. These features of claim 24-25 patentably distinguish over the cited art, and they are submitted to be allowable for the recitations therein.

Conclusion

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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